

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED PROMOTIONS, INC. and)	
FERNANDO FIGUEREDO,)	
)	C.A. No. 2011-CV-6892
Petitioners,)	
)	Judge Der-Yeghiayan
v.)	
)	Magistrate Judge: Brown
LINDSAY CORP., ANDRES GACHARNA,)	
and CATHERINE E. LINDSAY,)	
)	
Respondents.)	

PETITIONERS' NOTICE OF MOTION

Petitioners United Promotions, Inc. and Fernando Figueredo hereby provide notice to Respondents Lindsay Corp., Andrew Garcharna, and Catherine E. Lindsay that Petitioners' MOTION FOR ENTRY OF DEFAULT AND JUDGMENT AGAINST RESPONDENT LINDSAY CORP. (filed concurrently herewith and served on Respondents on February 9, 2012 and assigned docket no. 29) shall be heard before Judge Der-Yeghiayan on Wednesday, February 15, 2012, 9:00 am at the United States District Court for the Northern District of Illinois, Eastern Division, in Courtroom 1903.

Dated: February 9, 2012

Respectfully submitted,

/s/ Jon H. Beaupré
Timothy Q. Delaney (IL Bar No. 6198816)
Jon H. Beaupré (IL Bar No. 6298230)
Brinks Hofer Gilson & Lione
NBC Tower, Suite 3600
455 North Cityfront Plaza Drive
Chicago, Illinois 60611-5599
Telephone: (312) 321.4200
Facsimile: (312) 321.4299
tdelaney@brinkshofer.com
jbeaupre@brinkshofer.com

Jeffrey J. Toney
Darcy L. Jones
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
1360 Peachtree Street, N.E. Suite 1150
Atlanta, Georgia 30309
Tel. (404) 260-6084
Fax (404) 393-9761
JToney@kasowitz.com
DJones@kasowitz.com

**Attorneys for Petitioners United Promotions, Inc.
and Fernando Figueredo**

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED PROMOTIONS, INC. and)	
FERNANDO FIGUEREDO,)	
)	C.A. No. 2011-CV-6892
Petitioners,)	
)	Judge Der-Yeghiayan
v.)	
)	Magistrate Judge: Brown
LINDSAY CORP., ANDRES GACHARNA,)	
and CATHERINE E. LINDSAY,)	
)	
Respondents.)	

CERTIFICATE OF SERVICE

I, Jon H. Beaupré, hereby certify that on February 9, 2012, I served the attached NOTICE OF MOTION via the following means.

For Andres Gacharna and Catherine E. Lindsay,
via the CM/ECF system which sent notification of
such filing to the following:

Andrew R. Schwartz
Thomas Kanyock
SCHWARTZ & KANYOCK, LLC
111 N. Canal Street, Ste. 394
Chicago, Illinois 60606
Tel. (312) 441-1040
andy@schwartz-lawyer.com
tjk@schwartz-lawyer.com

For Lindsay Corp., via hand delivery to
the following:

Lindsay Corp.
310 South Michigan Ave., #2013
Chicago, IL 60604

Dated: February 9, 2012

/s/ Jon H. Beaupré
Jon H. Beaupré